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10 Attorneys for Defendant,  
11 SEAGATE TECHNOLOGY LLC

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14  
15 IN RE SEAGATE TECHNOLOGY LLC  
16 LITIGATION

17 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**DECLARATION OF HARRIE NETEL IN  
SUPPORT OF SEAGATE'S OPPOSITION  
TO PLAINTIFFS' MOTION FOR CLASS  
CERTIFICATION**

18 Date: March 30, 2018

19 Time: 9:30 a.m.

20 Place: Courtroom G

Judge: Hon. Joseph C. Spero

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22 Second Consolidated Amended Complaint  
filed: July 11, 2016

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24 REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

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## DECLARATION OF HARRIE NETEL

I, Harrie Netel, declare as follows:

4       1. I have personal knowledge of the facts set forth herein, which are known by me to be  
5 true and correct, and if called as a witness, I could and would competently testify thereto.

6           2. I received my Masters in Physics from the University of Twente, The Netherlands in  
7 1994 and my PhD in Physics from the University of Twente, The Netherlands in 1999.

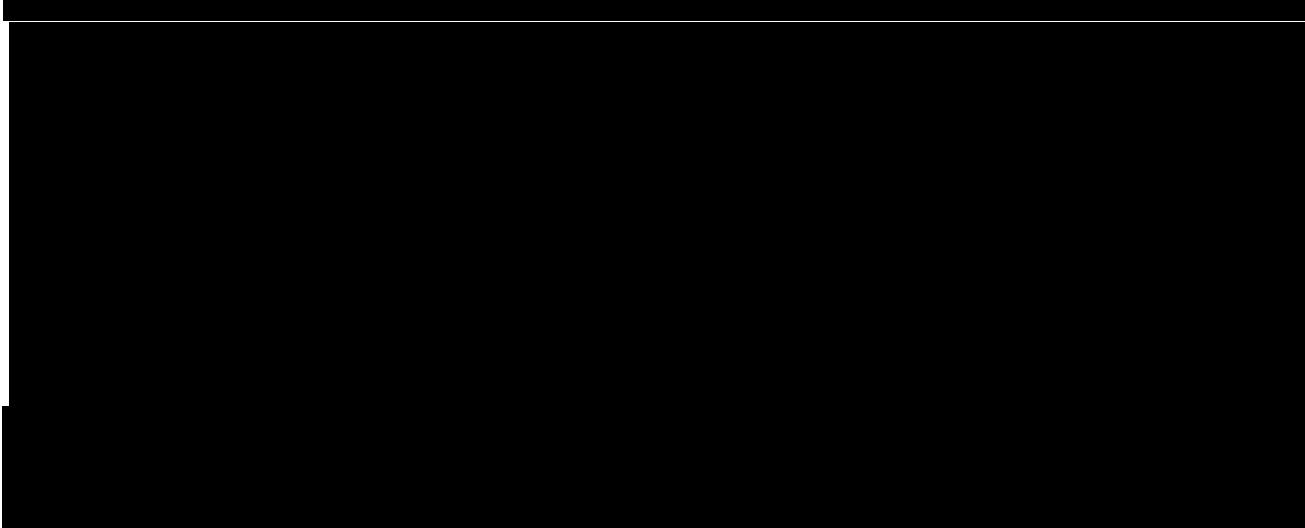
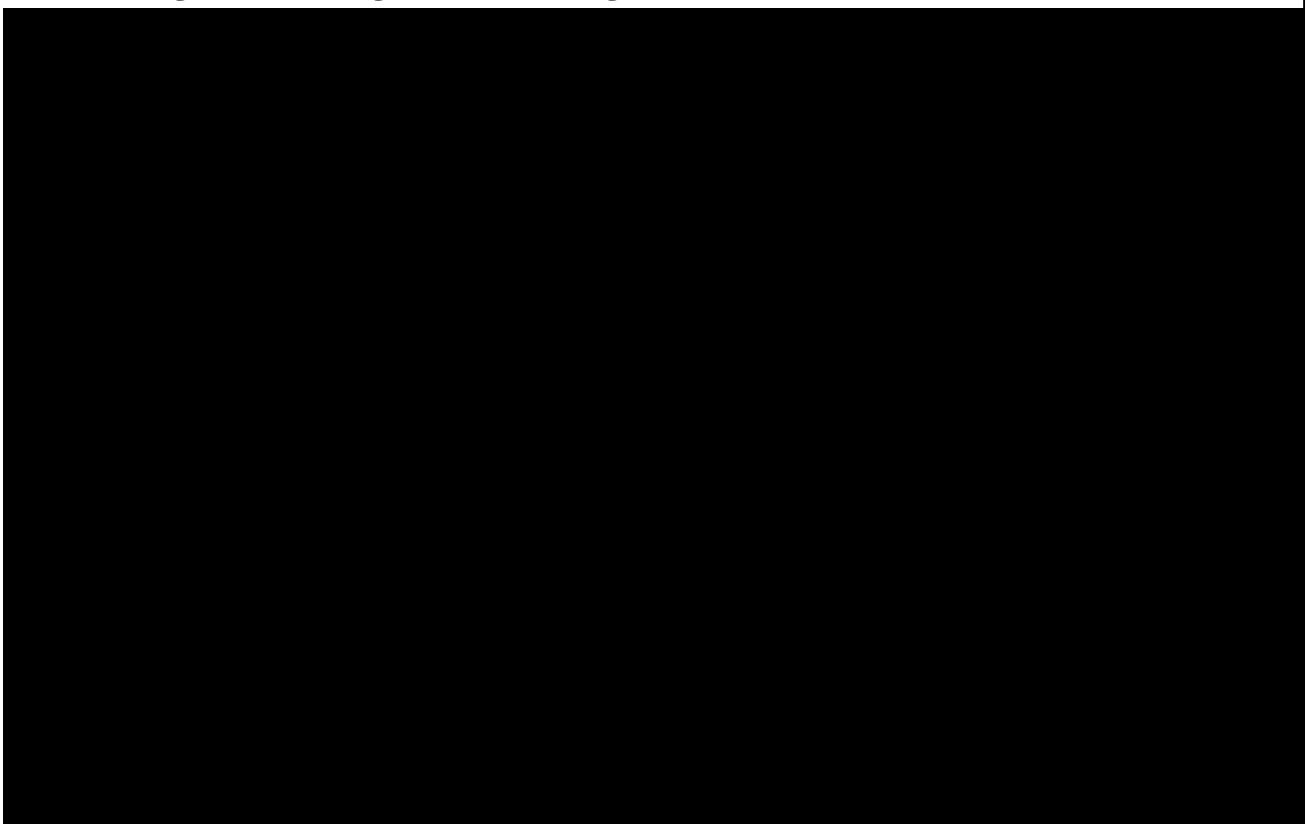
8       3. I was employed by Lawrence Livermore National Laboratory (as a physicist) from  
9 1994 to 1999 and then by General Electric (“G.E.”) from 1999 to 2005. While at G.E., I initially  
10 worked as a physicist and later in six sigma with a focus on quality and reliability engineering for  
11 the manufacture of medical equipment, specifically, computed tomography (“CT”) scanners. From  
12 2005 to the present, I have been employed by Seagate Technology, LLC (“Seagate”). From 2005 to  
13 2011, I worked initially as a Principal Six Sigma Master Black Belt and later as the Director of Field  
14 Quality Analytics in Seagate’s Longmont, Colorado facility. In these roles, I led teams using  
15 empirical, statistical methods to measure and improve Seagate’s product Quality and Reliability by  
16 identifying and removing the causes of defects in products and minimizing variability in  
17 manufacturing, the supply chain or in some cases even our customers’ processes. In January 2012, I  
18 moved to China and became Director of Operations Quality and Analytics, and in August 2013 I  
19 was promoted to Senior Director Operations Quality and Analytics. While in China I was initially  
20 stationed in Suzhou, China and since January 2017 in Wuxi, China. My current role is to ensure the  
21 outgoing Quality of all Seagate’s hard drives meets our customers’ requirements. My current  
22 responsibilities include Supplier Quality Engineering (for incoming components), Factory Quality  
23 (for Seagate’s outgoing quality control) as well as Factory and ODM Customer Technical Support.

24 4. Since March 2015, I have supervised Seagate's "ongoing reliability testing" or  
25 "ORT," which refers to Seagate's process of assessing and improving the ongoing reliability  
26 performance of the products shipped from Seagate's factories. ORT begins once products are  
27 approved for sale to customers. I also supervise other types of post-release testing Seagate  
28 performs, including Outgoing DPPM Testing (ODT) and Periodic Design Margin Testing (PDMT).

1       5. I have reviewed the documents discussed in my declaration, conferred with other  
2 employees at Seagate, and make the following statements based on my personal knowledge of  
3 Seagate's practices and procedures and the results of my review and investigation.

4       6. I have reviewed the declaration of Andrew Hospodor filed in support of Plaintiffs'  
5 Motion for Class Certification. In it, Mr. Hospodor reviews internal Seagate documents and states  
6 opinions that are, in many cases, clearly wrong, as explained below.

7 **A. Background on Seagate Drive Testing**



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<sup>1</sup> All exhibit numbers refer to Exhibits attached to the Declaration of Liêm Payne.

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4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

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Executed on this 5<sup>th</sup> day of January, 2018, at Cupertino, CA.

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Harrie Netel

